DRAFT LIST INFORMATION FOR SECTION 3 FS ISSUES

1. **PRGs.**

    a. EPA to provide updated PRGs table with any new dioxin/furan PRGs, when available.

2. Determination of any **technology evaluation and selection methods** (i.e., for dredging, capping, Enhanced Monitored Natural Recovery, or in-situ treatment) needed to determine the feasible application of that technology to various portions of the Site.

    a. EPA to provide any additional changes to pixel map, pixel smoothing conducted, criteria supporting map, and SMA/subSMAs delineations since 9-Jun-14. EPA agreed at the July 31 meeting to provide GIS layers of this information to LWG after D/F RAL was updated.

3. Final decisions **on Remedial Action Levels (RALs)** to be used to define SMAs.

    a. EPA to provide example of RAL curves that will be presented in Section 3. (At the July 31 meeting EPA indicated such RAL curves would be included.)

    b. EPA to provide latest dioxin/furan RALs, if any additional changes proposed by EPA. Given EPA is currently revising dioxin/furan PRGs, the LWG is unclear whether this would cause any shift in the dioxin/furan RALs.

4. Methods for **evaluating SDUs**, which EPA indicated it is still working on.

    a. EPA to provide a presentation or summary of SDU evaluation for Section 3. (EPA indicated on July 31 that this evaluation was not completed yet, and agreed that EPA could show LWG the evaluation before Section 3 is completed.)

5. The use of **equilibrium values** in the revised FS. The LWG submitted a general proposal on June 19, 2014 and then a later detailed proposal to EPA on August 7, 2014 regarding the use of equilibrium values.

    a. EPA to review and respond to or meet to discuss with LWG the equilibrium proposals.

6. **Source material (preference for removal**) methodologies and how technologies will be assigned for alternatives within any source material areas.

    a. EPA to provide a description of current methodology for identifying source material areas. (EPA indicated on August 5th they were dropping their proposed use of the 5 x B RALs methods.)

    b. EPA to provide a map of identified source material areas. (EPA indicated on August 5th they would provide something to the LWG in a few weeks.)

c. EPA to provide a presentation or summary of how technologies are assigned to source material areas (if any different from the EPA-standard technology assignment approach for all SMAs).

7. **Principle Threat Waste (PTW) issues**. LWG submitted in August 7, 2014 a response to EPA's PTW identification and evaluation method.

    a. EPA to review and respond to or meet to discuss with LWG regarding the LWG PTW responses.

    b. EPA to present or summarize how technologies are assigned to PTW areas (if any different from the EPA-standard technology assignment approach for all SMAs).

8. Methods for **mapping SMAs** based on the final RALs. EPA has indicated several method differences for applying the RALs to determine SMA footprints.

    a. EPA to present SMAs variations and summarize any uncertainty discussions related to SMA areas/volumes that will be presented in Section 3. (EPA indicated on August 5th that two variations, one based on EPA's mapping approach and one based on LWG's draft FS mapping approach, but not draft FS RALs, would be depicted).

9. Any methods and results of **buried contamination evaluations**.

    a. EPA indicated on August 5th that extent of SMAs will not be expanded based on buried contamination analyses. See DOI, dredge depth, and volume items below.

10. The **assignment of disposal sites** to each alternative screened. EPA has indicated that all alternatives will assume upland disposal.

    a. EPA to present or summarize which alternatives are assigned CDF options for alternatives development and screening process and methods used for those assignments (e.g., based on a ratio of CDF volume capacity and an assumed harbor-wide dredge volume).

    b. EPA to present or summarize any screening level volumes and costs that are assigned for these CDF options for alternative screening process, and general methods for estimating costs.

    c. EPA to present or summarize the 404 memo outline and expected major conclusions with regards to CDFs and the alternatives in general. (This is likely a Section 4 item and could be postponed to those discussions. But to the extent that the 404 memo would impact CDF or alternative screening, summary information on those determinations for Section 3 would be helpful.)

11. Any **changes to CDF evaluation or characterization methods** need to be defined. For example, EPA has requested additional information on CDFs but it is unclear how this

information will play into disposal option descriptions or alternatives development in the revised FS.

a. EPA to present or summarize how LWG responses to CDF information requests are used in the Section 3 development and screening of alternatives involving CDFs.

12. Any changes to **depth of impact (DOI), dredge depth or volume estimates**. EPA provided a draft memo describing some alternate methods for these estimates. The LWG responded to this memo with some recommendations. On August 5th EPA indicated that the draft EPA memo was preliminary and that the DOI, dredge depth, and volume estimation methods would be substantially refined beyond that preliminary EPA memo.

    a. EPA to present or summarize how the subsurface contamination figures currently under development (based on Tittabawassee River example) may be used in DOI, dredge depth, and volume estimates.

    b. EPA to present or summarize how RALs and PRGs may be used to define DOIs in various subareas of the SMAs and across alternatives.

    c. EPA to present or summarize how RALs, PRGs, and any additional information may be used to define dredge depths in various subareas of the SMAs and across alternatives.

    d. EPA to present or summarize methods and results of volume calculations based on DOIs, dredge depths, and other data or determinations (e.g., overdredge allowances, cleanup pass depths, bulking factors, allowance ratios, etc.) for SMAs and alternatives.

    e. EPA to present or summarize methods to determine and evaluate the results of combination technology assignments and how those impact volume estimates (e.g., decision to dredge to 5 feet and cap back in an area with a DOI of 12 ft).

    f. EPA to present or summarize any comparative or alternate DOI, dredge depth, or volume methods (e.g., as part of uncertainty analysis perhaps) for Section 3.

13. Methods for **identification, screening, and selection of alternatives** for detailed evaluation need to be described.

    a. EPA to present or summarize technology assignment "optimization" and refinement (e.g., dredge cap back, dredge cover, partial dredge and cover, etc.) methods and results by SMA and how those vary by alternative, if at all.

    b. EPA to present or summarize rationale for technology assignment refinements, if any, related to habitat impacts, flood impacts, no water surface area loss, navigation requirements, DSL lease requirements, and similar factors.

c. EPA to present or summarize alternatives that will be screened in Section 3 (all alternatives considered in Section 3).

d. EPA to present or summarize screening criteria and data supporting criteria evaluation for alternative screening process (e.g., methods and results of screening level cost estimates, feasibility assessments, and effectiveness assessments).

e. EPA to present or summarize alternatives that will pass through to Section 4 for detailed evaluations.

f. EPA to present or summarize any details of alternatives descriptions that are added to the alternatives as part of the screening or in preparation for detailed evaluations in Section 4 (e.g., institutional controls, sequencing, durations, work windows, technology options like mechanical vs. hydraulic dredging assumptions, EMNR depths, standard capping x-sections, dredge BMPs, barrier walls, dredging around or removal of structures, residual management, long term monitoring assumptions for each alternative.)